# Exhibit B

DECLARATION OF BRETT D. HARRISON AND FTI CONSULTING, INC.

Document 3604-38 Filed 07/30/25

Page 2 of 59

Case No. 3:23-md-03084-CRB

Case 3:23-md-03084-CRB

### **DECLARATION OF BRETT D. HARRISON AND FTI CONSULTING, INC.**

I Brett D. Harrison, am a Senior Managing Director within FTI Consulting, Inc.'s ("FTI") Technology Segment. I submit this declaration in support of Defendants Uber Technologies, Inc., Raiser, LLC, and Raiser-CA, LLC's Motion for Entry of (1) an Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona-Fide Receipts Should Not Be Dismissed with Prejudice and (2) a Case Management Order Addressing Certain Plaintiffs Who Have Not Submitted Receipts.

### **BACKGROUND AND QUALIFICATIONS**

I currently lead FTI's Digital Forensics Practice. I have over thirty years of experience assisting clients with Digital Forensic and Electronic Discovery (e-Discovery) related engagements. Since joining FTI, I have led many dozens of engagements involving the investigation of Intellectual Property (IP) theft, forensic data collection and the processing and analysis of data.

Prior to my employment with FTI, I was employed by the Federal Bureau of Investigation (FBI) for fifteen years. For seven of those years (from 1999 until 2006), I worked within the FBI's Computer Analysis Response Team (CART) Unit in Washington, D.C. The FBI's CART Unit is responsible for the forensic acquisition and processing of all computers which are examined by the FBI. During my tenure with the CART Unit, I worked as both an FBI Certified Forensic Examiner of computer evidence and as a Program Manager. As a Computer Forensic Examiner, I conducted acquisitions and forensic examinations of a wide range of computers including laptops, desktops and servers as well as computers which utilized both Windows and UNIX operating systems.

Following my certification as a Forensic Examiner, I also served as a Program Manager within the CART Unit and was responsible for ensuring that the FBI's 400 Forensic Examiners of computer evidence had the necessary knowledge, skills and tools required to perform forensic examinations. As a Program Manager, I focused on leading the development of custom and semi-custom forensic tools to allow the FBI's Forensic Examiners to accurately collect, preserve, and process data from computer systems.

During the course of my career, I have conducted many hundreds of forensic analyses and have authored hundreds of forensic reports. I have testified in court twenty times in both civil and criminal

During my review, I relied upon other members of the FTI Technology practice working under

matters. I have provided numerous written declarations and reports, and have been deposed several times. I have worked on both the plaintiff and defendant sides of many engagements and have even served in a neutral capacity on numerous occasions.

FTI is a well-respected, independent, global business advisory firm dedicated to helping organizations manage change, mitigate risk, and resolve disputes: financial, legal, operational, political & regulatory, reputational, and transactional. The organization has more than 8,000 consultants and professionals in approximately 27 countries, and every year, FTI helps many thousands of organizations globally transform the way they anticipate and respond to events. The scope of FTI's clients includes, but is not limited to, many of Fortune's Global 100 corporations. I am supported by hundreds of dedicated digital forensics, cybersecurity, incident response, and data and analytics consultants, with cross-functional teams led by those with decades of experience at the highest levels of law enforcement, intelligence, and global private sector institutions.

FTI is being compensated for work in this matter at its currently standard hourly rates charged for each person working on the project. FTI's rates range from \$225/hour to \$895/hour—depending on the practitioner. Generally, simple forensic work is performed by lower bill rate practitioners, and more complex expert reporting and testimony work is performed by more senior practitioners. My current rate is \$895/hour.

No part of my or FTI's compensation is dependent on the contents of this Declaration, the substance of any further opinions I may offer, or the ultimate outcome of this matter.

### **SCOPE OF ASSIGNMENT**

I have been asked to compare and analyze 22 Uber receipts which were produced by Plaintiffs and which purport to show evidence of Uber ride activity by that Plaintiff. I visually scrutinized the receipts to look for discrepancies.

I reviewed and compared these to the population of actual receipts produced by Uber for other Plaintiffs' substantiated rides. Appendix A contains the bates numbers of files I reviewed.

I reviewed the affidavit of Uber employee Chad Dobbs, signed July 25, 2025, and have considered his statements, where applicable, in my analysis.

DECLARATION OF BRETT D. HARRISON AND FTI CONSULTING, INC.

Case No. 3:23-md-03084-CRB

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my direction. Any reference to "I," "my" or "FTI" include my efforts as well as those working under my supervision.

### **FINDINGS**

I understand, based on my knowledge, experience and research, that reviewing PDF metadata can provide insight into a PDF file's origin, history, and authenticity. I reviewed file metadata to show what particular software was used to create and produce the Uber PDF receipts.

I understand, based on my testing and research, that the website MakeReceipt[.]com advertises that it provides a service to "Customize, edit and download your receipt quickly and easily in 3 steps. Change fonts, add logos and modify any receipt details to create your custom receipts. Create receipts with subtotals, taxes, signature, tip lines and more!" With just a few basic inputs, Makereceipt.com can generate receipts that otherwise appear to have been generated by Uber (or other companies).

Makereceipt.com offers users different levels of membership, including "Standard," "Pro," and "Enterprise" plans. Makereceipt.com contains an FAQ section with the following question and answer: "[Question] Help! I am a member and still see watermarks on my receipt. [Answer] Many of our receipts are for PRO or Enterprise members only. You will see a watermark stating 'For Pro or Enterprise Members Only' on these receipts. They are also marked with a PRO emblem on the homepage. Standard members need to upgrade their account from the ACCOUNT page to access these PRO-level receipts." I understand that MakeReceipt[.]com places the watermark "FOR PRO OR ENTERPRISE MEMBERS ONLY" in particular receipts when created in the Uber template and using its "Standard" website service.

The 22 Uber receipts I reviewed contained evidence of being fabricated, changed or edited. My conclusions are based on evidence that includes discrepancies in content and formatting including font types, punctuation, fees, fee totals, payment types, timestamps, ride duration, rider and driver names, and use of watermarks from MakeReceipt[.]com.

Below are the details of my analysis:

### 1194 1170 - PTO 5 Submission.pdf

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understand that Plaintiff produced this file during the course of the litigation. Additionally, I reviewed receipts produced by Uber for other Plaintiffs' substantiated rides. I noted missing capitalization of street names, incorrect usage of a period after the state abbreviation, and a missing space before the state abbreviation. I noted the ride duration was listed as "23 hour 45 min," while the trip began at "11:46 PM" and ended at "12:01 AM," totaling 15 minutes. I was able to replicate this error by purchasing a Makereceipt.com account and inputting a ride-start time before midnight and a ride-end time after midnight, which generated a ride receipt showing a ride time close to 24 hours. I noted that the receipt did not contain the rider name. I noted that the top right date was not properly aligned. I noted that no embedded metadata detailing the creation and production application existed.



1194 1170 - PTO 5

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\_Req 6a\_2.pdf

### 2918 60483 - PTO 5 Submission.pdf

I reviewed the content of the file named "2918\_60483 - PTO 5 Submission.pdf" to determine whether there was an indication that the Uber receipt file content was fabricated, changed or edited. I understand that Plaintiff produced this file during the course of the litigation. Additionally, I reviewed receipts produced by Uber for other Plaintiffs' substantiated rides. I noted an incorrect total on the receipt, which states "\$7.12," where the actual total should be "\$7.03." I noted the payment timestamp occurred at "12:11 PM," prior to the trip start time of "12:28 PM" and end time of "12:35 PM." I noted that no embedded metadata detailing the creation and production application existed contrary to what was expected in an Uber PDF receipt.

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# Here's your receipt for your ride, We hore you enjoyed your ride the evening. Total \$7.12 Total \$7.12 Substant \$5.99 Substant \$6.99 Substant \$6.99 Substant \$6.99 Porcedor 7.89 Substant \$6.99 Subst

2918 60483 - PTO 5

### 3425 - PTO 5 Submission.pdf

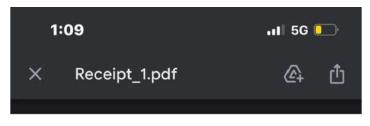
I reviewed the content of the file named "3425 - PTO 5 Submission.pdf" to determine whether there was an indication that the Uber receipt file content was fabricated, changed or edited. I understand that Plaintiff produced this file during the course of the litigation. Additionally, I reviewed receipts produced by Uber for other Plaintiffs' substantiated rides. In reviewing "3425 - PTO 5 Submission.pdf," I observed an incorrect final total on the receipt, which states "\$14.99," when the actual sum was "\$14.49." I noted an inconsistency with Uber's "CA Driver Benefits" fee being listed in a receipt for a Texas trip. See Chad Dobbs July 25, 2025, declaration at 2:10-14. I noted an inconsistency with Uber's payment date notation where one receipt payment date is "6/8/22," which indicates a year before ride was completed (6/8/2023). I noted that no embedded metadata detailing the creation and production application existed.

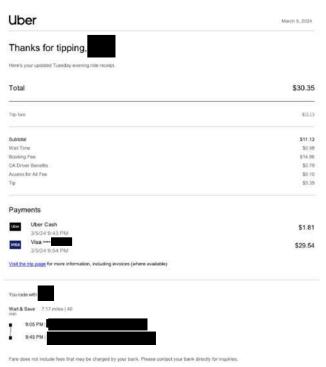
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3425 - PTO 5

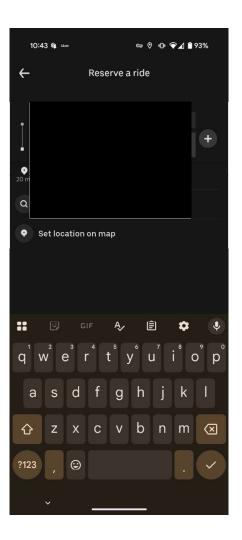
### **38683 - PTO 5 Submission.pdf**

I reviewed the content of the file named "2723\_38683 - PTO 5 Submission.pdf" to determine whether there was an indication that the Uber receipt file content was fabricated, changed or edited. I understand that Plaintiff produced this file during the course of the litigation. Additionally, I reviewed receipts produced by Uber for other Plaintiffs' substantiated rides. In reviewing "2723\_38683 - PTO 5 Submission.pdf," I observed an incorrect final total on the receipt, which states "\$30.35," when actual sum is "\$33.35." There is also an inconsistency with Uber's "CA Driver Benefits" fee being listed in a receipt for a Nevada trip. *See* Chad Dobbs July 25, 2025, Declaration at 2:10-12 and 2:15-16. I noted an inconsistency with the listed total trip mileage. I verified, using Google Maps, that the ride distance varied between 15–23 miles depending on traffic conditions and route preference. I used the Uber application to calculate the estimated distance and Uber estimated the route distance to be 20 miles (see my exemplar "FTI map LV trip.png" below). I noted that the starting address line had its first character and last character font in bold. I noted that the embedded metadata indicated the file was created by "Adobe Acrobat 24.4" and produced by "Adobe Acrobat 24.4 Image Conversion Plugin" and not Uber's PDF receipt creator "wkhtmltopdf" and producer "Qt".





2723\_38683 - PTO 5

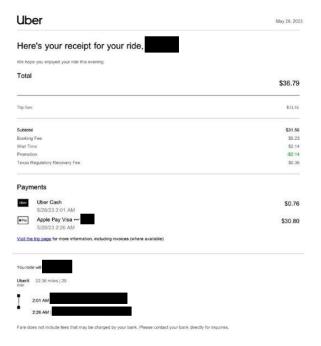


FTI map LV trip.png

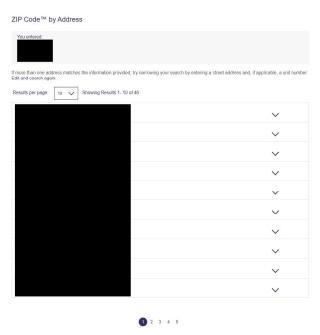
### 3038 - PTO 5 Submission.pdf

I reviewed the content of the file named "3038 - PTO 5 Submission.pdf" to determine whether there was an indication that the Uber receipt file content was fabricated, changed or edited. I understand that Plaintiff produced this file during the course of the litigation. Additionally, I reviewed receipts produced by Uber for other Plaintiffs' substantiated rides. In reviewing "3038 - PTO 5 Submission.pdf," I observed an incorrect final total on the receipt, which states "\$36.79," when the actual sum is "\$37.15." I noted there is a missing suffix (Lane, Road, Street) on the trip's end point street address. I noted that the destination address on the receipt appears invalid. The destination address does not exist according to the United States Postal Service's website zip code lookup by address tool. I verified that this address could not be inputted as a destination using the Uber mobile application. I noted that the embedded metadata indicated the file was created by "Adobe Acrobat

24.5" and produced by "Acrobat Distiller 24.0 (Windows)" and not Uber's PDF receipt creator "wkhtmltopdf" and producer "Qt".



3038 - PTO 5 Submission



USPS Search Using - <a href="https://tools.usps.com/zipcode-lookup.htm">https://tools.usps.com/zipcode-lookup.htm</a>?byaddress

### 3286 - PTO 5 Submission.pdf

I reviewed the content of the file named "3286 - PTO 5 Submission.pdf" to determine whether there was an indication that the Uber receipt file content was fabricated, changed or edited. I

understand that Plaintiff produced this file during the course of the litigation. Additionally, I reviewed receipts produced by Uber for other Plaintiffs' substantiated rides. I noted a missing space after the comma of the starting point's street address. I noted a "NV Recovery Surcharge" fee being listed in a receipt for an Iowa trip. See Chad Dobbs July 25, 2025, declaration at 2:10-12 and 2:15-16. I reviewed the hyper link associated with "view the trip page" link and determined that the URL was associated with a different Uber trip ID based upon the trip ID being the same as "Real Receipt from Account - PDF Version.pdf". I noted there is a space missing between the payment date and timestamp. I noted that the payment timestamp occurs at "9:20 PM," which is prior to the trip which starts at "9:34 PM" and ends at "9:50 PM." I noted that the embedded metadata indicated the file was created by "Microsoft® Word 2016" and produced by "Microsoft® Word 2016" and not Uber's PDF receipt creator "wkhtmltopdf" and producer "Qt".



3286 - PTO 5 Submission

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Real Receipt from - PDF Version.pdf

### 2812 45645 - PTO 5 Submission.pdf

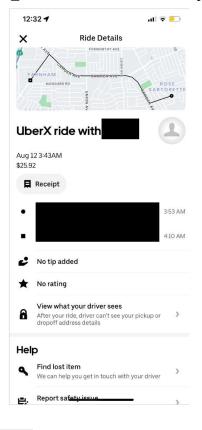
I reviewed the content of the file named "2812\_45645 - PTO 5 Submission.pdf" to determine whether there was an indication that the Uber receipt file content was fabricated, changed or edited. I understand that Plaintiff produced this file during the course of the litigation. Additionally, I reviewed receipts produced by Uber for other Plaintiffs' substantiated rides. I determined the file contained inconsistencies showing fabrication of an Uber receipt file had occurred. I noted that the file contained an embedded hidden watermark "FOR PRO OR ENTERPRISE MEMBERS ONLY". I noted that the file was missing the address suffix (Lane, Road, Street) and comma between City and State for both the pick-up and drop-off locations. I noted that the embedded metadata indicated the file was created by "Adobe Acrobat 24.5" and produced by "Adobe Acrobat 24.5 Image Conversion Plug-in" and not Uber's PDF receipt creator "wkhtmltopdf" and producer "Qt".

DECLARATION OF BRETT D. HARRISON AND FTI CONSULTING, INC.

Case No. 3:23-md-03084-CRB



### 2812\_45645 - PTO 5 Submission.pdf



(MDLC ID 2699) (24-cv-07940).pdf

### 2734 39150 - PTO 5 Submission.pdf

I reviewed the content of the PDF named "2734\_39150 - PTO 5 Submission.pdf" to determine whether there was an indication that the Uber receipt file content was changed or edited. I understand that Plaintiff produced this file during the course of the litigation. Additionally, I reviewed receipts produced by Uber for other Plaintiffs' substantiated rides. I determined the file contained inconsistencies showing editing and changing to the Uber receipt file had occurred. I noted that the file contained a state of Nevada surcharge contrary to being a trip that occurred in the state of Texas. I noted that the file was missing a charge for "Texas Regulatory Recovery Fee" that is expected for a trip that occurred in the state of Texas. I noted that payment time did not occur at the conclusion of the trip rather it occurred over an hour prior to the trip. I noted that the embedded metadata indicated the file was produced by "Microsoft: Print To PDF" and not Uber's PDF receipt creator "wkhtmltopdf" and producer "Qt".



2734 39150 - PTO 5 Submission.pdf

Total	\$5.21
Trip fare	\$3.84
Subtotal	\$3.84
Backing Fee 🥹	\$1.32
Texas Regulatory Recovery Fee	\$0.05
Payments	
American Medical Response (AMR) 0/20/24 422 AM	\$5.21
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4:22 AM	

### 2350 20922 - PTO 5 Submission.pdf

I reviewed the content of the file named "2350\_20922 - PTO 5 Submission.pdf" to determine whether there was an indication that the Uber receipt file content was fabricated, changed or edited. I understand that Plaintiff produced this file during the course of the litigation. Additionally, I reviewed receipts produced by Uber for other Plaintiffs' substantiated rides. I determined the file contained inconsistencies showing editing and changing of an Uber receipt file had occurred. I noted that the first name of the rider was missing despite a comma at the end of "Here's your receipt for your ride,". I noted that the scanned copy of hardcopy printout did not contain a payment timestamp that is expected in an Uber receipt file. I noted that the scanned copy of a hardcopy printout did not contain a two digit year notation in the payment date. I noted that the scanned copy of hardcopy printout contained the forward slash (/) special character which is contrary to the expected pipe (|) special character. I noted that the start time and end time of trip was missing the time notation AM or PM. I noted that no embedded metadata detailing the creation and production application existed.

Here's your receipt for your ric 2350 - Jane Doe LS 397 (

) real receipt underlying fake.pdf



2350 20922 - PTO 5 Submission.pdf

### 3078 - PTO 5 Submission.pdf

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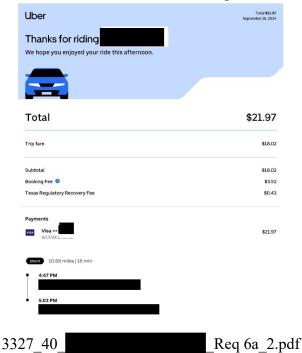
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I reviewed the content of the file named "3078 - PTO 5 Submission.pdf" to determine whether there was an indication that the Uber receipt file content was fabricated, changed or edited. I understand that Plaintiff produced this file during the course of the litigation. Additionally, I reviewed receipts produced by Uber for other Plaintiffs' substantiated rides. I determined the file contained inconsistencies showing editing and changing of an Uber receipt file had occurred. I noted that the booking fee contained an extra zero (\$02.60) in its notation. I noted that the payment detail date contained a zero (03/12/23) in its month notation. I noted that the subtotal fees are misaligned right. I noted that the starting address location contained an extra space between TX and Zip code. I noted that the "TX Recovery Surcharge" is an inconsistent fee. I noted that the embedded metadata indicated

the file was created by "Adobe Acrobat Pro (64-bit) 24.3.20112" and produced by "Adobe Acrobat Pro (64-bit) 24.3.20112" and not Uber's PDF receipt creator "wkhtmltopdf" and producer "Qt".



3078 - PTO 5 Submission.pdf



### 3422 - PTO 5 Submission.pdf

I reviewed the content of the file named "3422 - PTO 5 Submission.pdf" to determine whether there was an indication that the Uber receipt file content was fabricated, changed or edited. I understand that Plaintiff produced this file during the course of the litigation. Additionally, I reviewed

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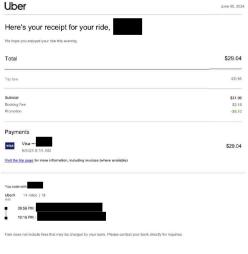
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receipts produced by Uber for other Plaintiffs' substantiated rides. I determined the file contained inconsistencies showing editing and changing of an Uber receipt file had occurred. I noted that the destination address is missing a comma between the street suffix and city. I noted that the embedded metadata indicated the file was created by "Adobe Acrobat 24.2" and produced by "Adobe Acrobat 24.2 Image Conversion Plug-in" and not Uber's PDF receipt creator "wkhtmltopdf" and producer "Ot".



3422 - PTO 5 Submission.pdf



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### 2959 60514 - PTO 5 Submission.pdf

I reviewed the content of the file named "2959\_60514 - PTO 5 Submission.pdf" to determine whether there was an indication that the Uber receipt file content was fabricated, changed or edited. I understand that Plaintiff produced this file during the course of the litigation. Additionally, I reviewed

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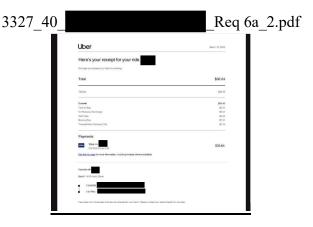
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receipts produced by Uber for other Plaintiffs' substantiated rides. I determined the file contained inconsistencies showing editing and changing of an Uber receipt file had occurred. I noted that the file contained a state of Nevada surcharge contrary to being a trip that occurred in the state of Texas. I noted that the file was missing a charge for "Texas Regulatory Recovery Fee" that is expected for a trip that occurred in the state of Texas. See Chad Dobbs July 25, 2025, declaration at 2:10-12. I noted that the starting address time stamp contained three digits for the seconds (7:018 PM) notation contrary to the expected seconds notation. I noted a missing comma in the destination address. I noted that the payment timestamp occurred before the ride ended timestamp. I noted that the embedded metadata indicated the file was created by "Adobe Acrobat Pro (64-bit) 24.3.20180" and produced by "Adobe Acrobat Pro (64-bit) 24.3.20180" and not Uber's PDF receipt creator "wkhtmltopdf" and producer "Qt".





2959\_60514 - PTO 5 Submission.pdf Receipt 1.pdf

### 3198 - PTO 5 Submission.pdf

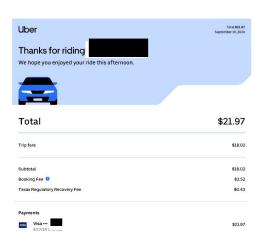
I reviewed the content of the file named "3198 - PTO 5 Submission.pdf" to determine whether

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there was an indication that the Uber receipt file content was fabricated, changed or edited. I understand that Plaintiff produced this file during the course of the litigation. Additionally, I reviewed receipts produced by Uber for other Plaintiffs' substantiated rides. I determined the file contained inconsistencies showing editing and changing of an Uber receipt file had occurred. I noted that "0 hour" was included in the ride duration. I was able to replicate this inconsistency by purchasing a MakeReceipt[.]com account and inputting a ride duration less than an hour with a ride-start time and a ride-end time before midnight, which generated a ride receipt showing "0 hour". I noted that the embedded metadata indicated the file was produced by "Microsoft: Print To PDF" and not Uber's PDF receipt creator "wkhtmltopdf" and producer "Qt".



3198 - PTO 5 Submission.pdf



### 2103 19468 - PTO 5 Submission.pdf

I reviewed the content of the file named "2103\_19468 - PTO 5 Submission.pdf" to determine whether there was an indication that the Uber receipt file content was fabricated, changed or edited. I understand that Plaintiff produced this file during the course of the litigation. Additionally, I reviewed receipts produced by Uber for other Plaintiffs' substantiated rides. I determined the file contained inconsistencies showing editing and changing of an Uber receipt file had occurred. I noted the payment detail date for the Venmo payment did not include a timestamp. I noted that the embedded metadata indicated the file was created by "Adobe Acrobat 24.2" and produced by "Adobe Acrobat 24.2 Image Conversion Plug-in" and not Uber's PDF receipt creator "wkhtmltopdf" and producer "Qt".



Original Receipt -2022-08-26 Trip with .pdf



2103\_19468 - PTO 5 Submission.pdf

### 2277 19430 - PTO 5 Submission.pdf

I reviewed the content of the file named "2277\_19430 - PTO 5 Submission.pdf" to determine whether there was an indication that the Uber receipt file content was fabricated, changed or edited. I understand that Plaintiff produced this file during the course of the litigation. Additionally, I reviewed receipts produced by Uber for other Plaintiffs' substantiated rides. I noted a font inconsistency between the departure address and the arrival address. The departure address appears to be in a sans-serif font, whereas the arrival address is in a serif style font. There is also a comma between the ZIP and country in the departing location, but the arrival location has no comma. By comparison, the exemplar documents used for our analysis have commas for both locations. We also observed that the 2277 receipt is blurry relativity to the exemplar. The date of the alleged ride occurred on September 19, 2022 based on the date in the top right of the receipt, but the Venmo payment occurred on August 26, 2022 several weeks in advance. I noted that the embedded metadata indicated the file was created by "Adobe Acrobat 24.2" and produced by "Adobe Acrobat 24.2 Image Conversion Plug-in" and not Uber's PDF receipt creator "wkhtmltopdf" and producer "Qt".

2277 19430 - PTO 5 Submission.pdf



Original Receipt –2022-08-26 Trip with

### 3510 - PTO 5 Submission.pdf

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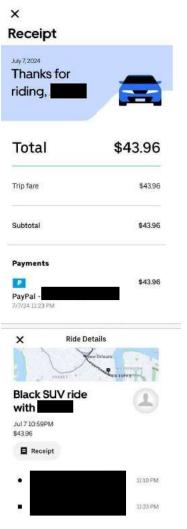
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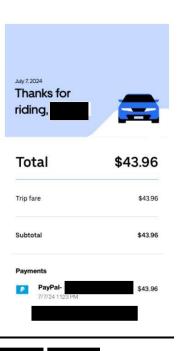
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I reviewed the content of the file named "3510 - PTO 5 Submission.pdf" to determine whether there was an indication that the Uber receipt file content was fabricated, changed or edited. I understand that Plaintiff produced this file during the course of the litigation. Additionally, I reviewed receipts produced by Uber for other Plaintiffs' substantiated rides. "3510 - PTO 5 Submission.pdf" appears to be a screen capture from a mobile device based on the "X" located on the upper lefthand side of the images. I noted there is no time, cell signal, Wi-Fi signal symbol, or battery life indicator in the top of each page. I noted this receipt appears to contain the same exact trip start time, end time,

locations, and amount as "3521 - PTO 5 Submission.pdf". I noted the payment date was different from "3521 - PTO 5 Submission.pdf" but the payment timestamp (11:23 PM) was the same. I noted that the trip payment time stamp was the same time as the receipt ("Real Receipt from Account - Mobile Version.pdf"). The alterations are consistent with this being created by adjusting a few select values from "Real Receipt from Account - Mobile Version.pdf". I noted that the embedded metadata indicated the file was created by "Microsoft Office Word" and produced by "Adobe Acrobat Pro (64-bit) 24.4.20272" and not Uber's PDF receipt creator "wkhtmltopdf" and producer "Qt".



3510 - PTO 5 Submission.pdf



Real Receipt from Account - Mobile Version.pdf

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3521 - PTO 5 Submission.pdf

### 3521 - PTO 5 Submission.pdf

I reviewed the content of the file named "3521 - PTO 5 Submission.pdf" to determine whether there was an indication that the Uber receipt file content was fabricated, changed or edited. I understand that Plaintiff produced this file during the course of the litigation. Additionally, I reviewed receipts produced by Uber for other Plaintiffs' substantiated rides. I noted that the 3521 receipt contained the same Trip ID as "Real Receipt from Account - Mobile Version.pdf". I noted that the 3521 receipt contained the same exact starting address and ending address and amount as "3510 - PTO 5 Submission.pdf". I noted the trip total and payment time is the same time as "Real Receipt from Account - Mobile Version.pdf" I noted that the embedded metadata indicated the file was created by "Acrobat PDFMaker 24 for Word" and produced by "Adobe PDF Library 24.4.48" and not Uber's PDF receipt creator "wkhtmltopdf" and producer "Qt".



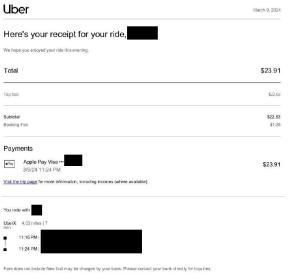
3521 - PTO 5 Submission.pdf



Real Receipt from Account - Mobile Version.pdf

### 3048 - PTO 5 Submission.pdf

I reviewed the content of the file named "3048 - PTO 5 Submission.pdf" to determine whether there was an indication that the Uber receipt file content was fabricated, changed or edited. I understand that Plaintiff produced this file during the course of the litigation. Additionally, I reviewed receipts produced by Uber for other Plaintiffs' substantiated rides. "3048 - PTO 5 Submission.pdf" appears to be an altered version of "Real Receipt from Account - PDF Version.pdf". Everything about the two receipts is exactly the same except for the month and driver name. The DD-YY remains the same, times remain the same, the trip and locations are identical, and the amounts are also the same. I noted that the embedded metadata indicated the file was created by "Acrobat PDFMaker 24 for Word" and produced by "Adobe PDF Library 24.5.96" and not Uber's PDF receipt creator "wkhtmltopdf" and producer "Qt".



3048 - PTO 5 Submission.pdf

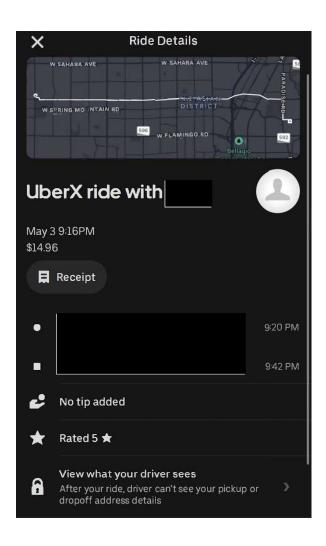
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Uber	August 9, 2024
Here's your receipt for your ride,	
We hope you enjoyed your ride this evening.	
Total	\$23.91
Trip fare	\$22.63
Subtotal Booking Fee	\$22.63 \$1.28
Payments	
Apple Pay Visa *** 8/9/24 11:24 PM  Visit the trip case for more information, including invoices (where available)	\$23.91
Yourode with UbenY 4.03 miles   7 miles   11:16 PM	
11:24 PM  Fare does not include fees that may be charged by your bank. Please contact your bank directly for inquiries.	

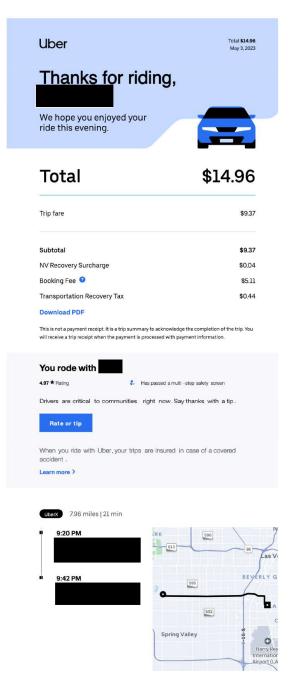
Real Receipt from Account - PDF Version.pdf

### 3303 - PTO 5 Submission.pdf

I reviewed the content of the PDF named "3303 - PTO 5 Submission.pdf" and compared it to "Real Receipt from Account - Email Version.pdf" to determine whether there was an indication that the Uber receipt file content was fabricated, changed or edited. Additionally, I reviewed receipts produced by Uber for other Plaintiffs' substantiated rides. I determined that the 3303 receipt appeared to be an edited mobile device version of "Real Receipt from Account - Email Version.pdf". I noted it contains nearly identical content with the exception of the driver's name. I noted that the driver's name appeared edited using a different letter font. I noted when comparing the "h" from the word "with", and the "h" from the word "that the letter fonts appeared to be different. I noted, while comparing both receipts, that both receipts contain identical trip addresses, start time, end time, start location, end location and fare total amounts. I noted that the embedded metadata of the 3303 receipt indicated the file was created by "Adobe Acrobat Reader" and produced by "Adobe Acrobat T5" and not Uber's PDF receipt creator "wkhtmltopdf" and producer "Qt".



3303 - PTO 5 Submission.pdf

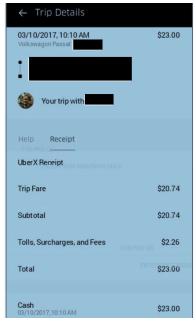


Real Receipt from Account - Email Version.pdf

### 1914 17758 - PTO 5 Submission.pdf

I reviewed the content of the PDF named "1914\_17758 - PTO 5 Submission.pdf" and to determine whether there was an indication that the Uber receipt file content was fabricated, changed or edited. I understand that Plaintiff produced this file during the course of the litigation. Additionally, I reviewed receipts produced by Uber for other Plaintiffs' substantiated rides. I determined that the document contained a hidden watermark embedded "FOR PRO OR ENTERPRISE MEMBERS

ONLY" consistent with fabricating a receipt using the website "makereceipt.com". I noted that the payment was made in Cash and I understand that Uber did not offer Cash payment in 2017 for rides in Minnesota. See Chad Dobbs July 25, 2025, declaration at 2:20-21. I noted that the embedded metadata indicated the file was created by "Aspose Ltd." and produced by "Aspose.PDF for .NET 22.6.0" and not Uber's PDF receipt creator "wkhtmltopdf" and producer "Qt".



1914\_17758 - PTO 5 Submission.pdf

### 3125 - PTO 5 Submission.pdf

I reviewed the content of the PDF named "3125 - PTO 5 Submission.pdf" and compared it to "Real Receipt from Account - PDF Version.pdf" to determine whether there was an indication that the Uber receipt file content was fabricated, changed or edited. Additionally, I reviewed receipts produced by Uber for other Plaintiffs' substantiated rides. I noted that the 3125 receipt contains nearly identical content as ""Real Receipt from Account - PDF Version.pdf" with the exception of the driver's and the rider's names. I noted, while comparing both receipts, that they contain identical trip addresses, start time, end time, start location, end location and fare total amounts. I noted that the embedded metadata indicated the file was created by "Microsoft: Print To PDF" and not Uber's PDF receipt creator "wkhtmltopdf" and producer "Qt".

case 3:23-md-03084-CRB Document 3604-38 Filed 07/30/25 Page 34 of 59

Here's your receipt for your ride.

We hope you rejoyed your ride this energy.

Total \$14.93

Trys force \$2000

\$214.93

Trys force \$2000

\$2000

\$312.06

\$3335

Payments

Payments

\$312.06

\$3335

Payments

\$314.93

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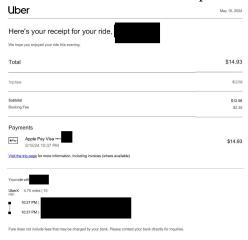
\$314.93

\$314.93

\$314.93

\$3

### 3125 - PTO 5 Submission.pdf

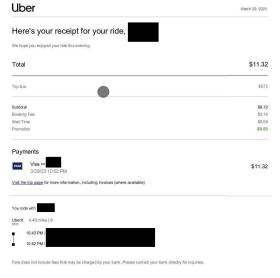


Real Receipt from Account - PDF Version.pdf

### 3047 - PTO 5 Submission.pdf

I reviewed the content of the PDF named "3047 - PTO 5 Submission.pdf" and compared it to "Real Receipt from Account - PDF Version.pdf" to determine whether there was an indication that the Uber receipt file content was fabricated, changed or edited. Additionally, I reviewed receipts produced by Uber for other Plaintiffs' substantiated rides. I determined that nearly all the information in the 3047 receipt appeared to be identical to "Real Receipt from Account - PDF Version.pdf" with the exception of the date and the rider's name. I noted that the 3047 receipt appeared to be March 29, 2023, and that "Real Receipt from Account - PDF Version.pdf" was March 29, 2024. I noted that in the 3047 receipt, the rider's name was in "Real Receipt from Account - PDF Version.pdf", the rider's name was I noted that the 3047 receipt contained a gray circle in the center of the receipt. I noted that the

embedded metadata indicated the file was created by "Adobe Acrobat Pro (64-bit) 24.4.20272" and produced by "Adobe Acrobat Pro (64-bit) 24.4.20272" and not Uber's PDF receipt creator "wkhtmltopdf" and producer "Qt".



3047 - PTO 5 Submission.pdf



Real Receipt from Account - PDF Version.pdf

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 30, 2025. Brett D. Harrison Senior Managing Director FTI Consulting Technology 1202V Brett D. Harrison 

Document 3604-38

Case 3:23-md-03084-CRB

Page 36 of 59

Filed 07/30/25

DECLARATION OF BRETT D. HARRISON AND FTI CONSULTING, INC. Case No. 3:23-md-03084-CRB

# Attachment 1 Documents Considered

#### **List of Documents Considered**

Plaintiff Doc. (MDLC)	2812_45645.pdf
Plaintiff Doc. (MDLC)	1914_17758.pdf
Plaintiff Doc. (MDLC)	1194_1170.pdf
Plaintiff Doc. (MDLC)	2918_60483.pdf
Plaintiff Doc. (MDLC)	3425_99063.pdf
Plaintiff Doc. (MDLC)	2723_38683.pdf
Plaintiff Doc. (MDLC)	3038_61464.pdf
Plaintiff Doc. (MDLC)	3286_100947.pdf
Plaintiff Doc. (MDLC)	2734_39150.pdf
Plaintiff Doc. (MDLC)	2350_20922.pdf
Plaintiff Doc. (MDLC)	3078_64231.pdf
Plaintiff Doc. (MDLC)	3422_97793.pdf
Plaintiff Doc. (MDLC)	2959_60514.pdf
Plaintiff Doc. (MDLC)	3198_85001.pdf
Plaintiff Doc. (MDLC)	2103_19468.pdf
Plaintiff Doc. (MDLC)	2277_19430.pdf
Plaintiff Doc. (MDLC)	3510_102628.pdf
Plaintiff Doc. (MDLC)	3521_104781.pdf
Plaintiff Doc. (MDLC)	3048_63657.pdf
Plaintiff Doc. (MDLC)	3303_89165.pdf
Plaintiff Doc. (MDLC)	3125_72294.pdf
Plaintiff Doc. (MDLC)	3047_63654.pdf
N/A	Real Receipt from Version.pdf  Account - PDF

N/A	2350 - Jane Doe LS 397 - real receipt underlying fake.pdf
N/A	Original Receipt - 2022-08-26 Trip with
N/A	Real Receipt from Version.pdf  Account - Mobile
N/A	Real Receipt from Version.pdf  Account - PDF
N/A	Real Receipt from Version.pdf  Account - Email
N/A	Real Receipt from PDF Version.pdf  Account -
N/A	Real Receipt from Version.pdf  Account - PDF
UBER-MDL3084- DFS00001272	- req 6a_1.pdf
UBER-MDL3084- DFS00001697	1011_40_Jane Roe CL 3 - req 6a_1.pdf
UBER-MDL3084- DFS00006581	1086_40_A.M req 6a_1.pdf
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UBER-MDL3084- DFS00009723	1119_40_Jane Doe LS 348 6a_1.pdf - req
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DFS00010859	req 6a_1.pdf
UBER-MDL3084-	1153 40 Jane Doe LS 253 - req
DFS00011479	
DFS000114/9	6a_1.pdf
UBER-MDL3084-	1157 40 Jane Doe LS 112
DFS00011608	req 6a 1.pdf
D1 500011000	req oa_r.pur
UBER-MDL3084-	1164 40 Jane Doe LS 388
DFS00011924	req 6a 1.pdf
UBER-MDL3084-	1167 40 Jane Doe LS 284 - req
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DI 300013040	oa_z.pui
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DFS00013276	req 6a 1.pdf
B1500013270	req ou_r.pur
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DFS00015016	

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UBER-MDL3084- DFS00038082	2140_40_	- req 6a_1.pdf
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UBER-MDL3084- DFS00062612	2713_40_Jane Roe CL 85 - req 6a_1.pdf
UBER-MDL3084- DFS00064113	2731_40 req 6a_1.pdf
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UBER-MDL3084- DFS00094902	2181_40_WHB 1844 6a_1.pdf	- req
UBER-MDL3084- DFS00095070	2187_40_WHB 1142	- req 6a_1.pdf
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UBER-MDL3084- DFS00096817	2751_40_	_Req 6a_1
UBER-MDL3084- DFS00097948	2787_40_	_Req 6a_1
UBER-MDL3084- DFS00097951	2787_40_	_Req 6a_2

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UBER-MDL3084- DFS00099769	2807_40_	_Req 6a_1
UBER-MDL3084- DFS00099772	2807_40_	_Req 6a_2
UBER-MDL3084- DFS00100445	2080 40 Jane Roe CL 21	
UBER-MDL3084- DFS00101967	2825_40_Jane Doe 691408 6a_1.pdf	Req
UBER-MDL3084- DFS00101970	2825_40_Jane Doe 691408 6a_2.pdf	Req
UBER-MDL3084- DFS00104212	2847 40_Jane Doe NLG Req 6a_1.pdf	
UBER-MDL3084- DFS00104776	2853_40_WHB 2062 6a_1.pdf	_Req
UBER-MDL3084- DFS00106061	2881_40_WHB 2039 6a_1.pdf	_Req
UBER-MDL3084- DFS00106064	2881_40_WHB 2039 6a_2.pdf	_Req
UBER-MDL3084- DFS00106919	2865_40_WHB 2074 6a_1.pdf	Req
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# Attachment 2 List of Publications and Prior Testimony

## **Brett D. Harrison Senior Managing Director** FTI Technology **555 12th Street, NW, Suite 700** Washington, DC 20004

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#### **Publications**

2021 – Co-authored an article related to new methods for analyzing mobile devices to determine whether they have been infected and/or hacked.

2021 – Co-authored an article on "Discovery in the Cloud." The article focused on taking a close look at the risks and challenges, specifically with respect to Dropbox.

2015 - Co-authored an article on Information Management.com titled "Forensic Files: Lessons from Real Cases" which dealt with collecting data from social media sites and mobile, BYOD devices.

#### Testimony, Reporting, Deposition and Declaration

11/10/2023 Nashville US District Court; Ecolab Inc. v. Anthony Ridley and Chemtreat, Inc. Retained by the Special Master and submitted an Expert Report related to activities observed on a number of computers.

6/29/2023 San Francisco US District Court; Wisk Aero v. Archer Aviation Submitted a Second Supplemental Expert Rebuttal Report in Support of Archer Aviation

4/26/2023 San Francisco US District Court; Wisk Aero v. Archer Aviation Submitted a Declaration in Support of Archer's Opposition to Wisk's Motion for Adverse Inferences

4/21/2023 Applied Predictive Technologies, Inc. v. Marketdial, Inc. et al. Provided Deposition testimony related to a number of Intellectual Property Theft related topics outlined in Expert Rebuttal Report dated 2/8/2023.

4/4/2023 San Francisco US District Court; Wisk Aero v. Archer Aviation Submitted a Supplemental Expert Rebuttal Report in Support of Archer Aviation

2/15/2023 San Francisco US District Court; Wisk Aero v. Archer Aviation Submitted a Sur-Reply Declaration in Support of Archer Opposition to Wisk's Spoliation Motion

2/8/2023 Applied Predictive Technologies, Inc. v. Marketdial, Inc. et al. Submitted an Expert Report related to the exfiltration and use of certain electronic Intellectual Property materials.

2/7/2023 San Francisco US District Court; Wisk Aero v. Archer Aviation Provided Deposition testimony related to a number of Intellectual Property Theft related topics outlined in Expert Rebuttal Report dated 1/27/2023.

1/27/2023 San Francisco US District Court; Wisk Aero v. Archer Aviation Submitted an Expert Rebuttal Report related to multiple topics surrounding potential misappropriation of electronic documents.

5/2/2022 San Francisco US District Court; Wisk Aero v. Archer Aviation Submitted a Declaration in support of certain Third Parties in opposition to a Wisk Aero LLC Motion to Compel Forensic Inspections.

2/11/2022 New York US District Court; George Galgano v. County of Putnam, New York, et al. Submitted an Affidavit which outlined FTI's process for organizing and threading TXT messages exported off mobile devices.

7/1/2021 San Francisco US District Court; Wisk Aero v. Archer Aviation Provided Deposition testimony to support a Declaration which documented the investigation and analysis of Archer's systems to attempt to locate any Wisk Aero Intellectual Property. Testimony covered multiple FTI workstreams to include Digital Forensics and also Brainspace analysis of Archer data.

6/24/2021 San Francisco US District Court; Wisk Aero v. Archer Aviation Submitted a Declaration to document FTI's investigation and analysis of Archer's systems to attempt to locate any Wisk Aero Intellectual Property. The Declaration covered multiple FTI workstreams to include Digital Forensics and also Brainspace analysis of Archer data.

# **Harrison Declaration REDACTED**

Final Audit Report 2025-07-30

Created: 2025-07-30

By: Deborah Hillburn (dhillburn@shb.com)

Status: Signed

Transaction ID: CBJCHBCAABAAHtZe55IHFfxJBJQYPO3DBMLouXRIfkPN

### "Harrison Declaration REDACTED" History

Document created by Deborah Hillburn (dhillburn@shb.com) 2025-07-30 - 4:59:32 PM GMT

Document emailed to brett.harrison@fticonsulting.com for signature 2025-07-30 - 5:01:00 PM GMT

Email viewed by brett.harrison@fticonsulting.com 2025-07-30 - 5:32:49 PM GMT

Signer brett.harrison@fticonsulting.com entered name at signing as Brett D Harrison 2025-07-30 - 5:34:05 PM GMT

Document e-signed by Brett D Harrison (brett.harrison@fticonsulting.com)
Signature Date: 2025-07-30 - 5:34:07 PM GMT - Time Source: server

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